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18 Attorneys for Defendants

19 UNITED STATES DISTRICT COURT
20
21 FOR THE TERRITORY OF GUAM
22

23 GUAM CONTRACTORS
24 ASSOCIATION, *et al.*,

25 Plaintiffs,

26 v.

27 WILLIAM P. BARR,
28 Attorney General of the United States,
et al.,

Defendants.

Civil No. 16-00075

DEFENDANTS' UNOPPOSED
REQUEST FOR A 14-DAY
EXTENSION OF TIME TO FILE
OBJECTIONS TO THE COURT'S
REPORT AND
RECOMMENDATION

1 Defendants, William P. Barr, Attorney General of the United States, *et al.*
2 (“Defendants” or “the Government”), request a fourteen (14) day extension of time
3 to file its objections to the Report and Recommendation (“R & R”) issued by the
4 Court on June 25, 2019. Government counsel exchanged email with Plaintiffs’
5 counsel on the instant matter, and counsel indicated that Plaintiffs do not oppose
6 the Government’s request. If the Court grants the Government’s unopposed
7 request, the deadline for the Government to file its objections to the R & R would
8 extend from July 9, 2019, local time to July 23, 2019, local time.

9 In support of this request, the Government states the following:

10 1. On June 25, 2019, the Court issued its R & R recommending the
11 District Court find that “Defendants have failed to comply with the Court’s PI
12 Order of January 24, 2018” ECF No. 126 at 12.

13 2. The Court set the Government’s deadline to file its objections to the
14 R & R by July 9, 2019.

15 3. On June 26 and 27, 2019, Government counsel exchanged email with
16 Plaintiffs’ counsel on the instant extension request.

17 4. Defendants require a short period of additional time to continue
18 review of the Court’s R & R and prepare its objections. The additional time
19 requested also takes into account the upcoming July 4 holiday and pre-planned
20 leave scheduled by undersigned counsel for the Government.

21 5. Plaintiffs indicated that they would not oppose the Government’s
22 instant extension request.

23 6. This is Defendants’ first request to extend their deadline to file
24 objections to the R & R.

25 7. Defendants submit that they are not requesting an extension for the
26 purpose of undue delay, and that the extension will not prejudice either party.

27 Good cause, therefore, supports this unopposed request for a fourteen (14)
28 day extension of time. Accordingly, Defendants request the Court extend the time

1 for Defendants to file its objections to the R & R from July 9, 2019, local time to
2 July 23, 2019, local time.

3 Dated: June 27, 2019

Respectfully submitted,

5 JOSEPH H. HUNT
Assistant Attorney General

7 WILLIAM C. PEACHEY
Director

9 SAMUEL P. GO
Senior Litigation Counsel

10 By: s/ Glenn M. Girdharry
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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2019, EST, I electronically filed the foregoing DEFENDANTS' UNOPPOSED REQUEST FOR A 14-DAY EXTENSION OF TIME TO FILE OBJECTIONS TO THE COURT'S REPORT AND RECOMMENDATION with the Clerk of Court by using the CM/ECF system, which will provide electronic notice and a hyperlink to this document to Plaintiffs' attorneys of record:

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I declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

Executed on June 27, 2019, EST, at Washington, DC.

By: s/Glenn M. Girdharry
GLENN M. GIRDHARRY
Assistant Director
United States Department of Justice
Civil Division